## UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF NORTH CAROLINA WESTERN DIVISION

United States of America,

No. 5:25-cv-00283

Plaintiff,

v.

North Carolina State Board of Elections; Sam Hayes, in his official capacity as Executive Director of the North Carolina State Board of Elections; Francis X. De Luca, Jeff Carmon, Stacy Eggers IV, Siobhan O'Duffy Millen, and Robert Rucho, in their official capacities as members of the North Carolina State Board of Elections; and State of North Carolina,

Defendants.

MOTION TO INTERVENE AS DEFENDANTS BY GABRIELA ADLER-ESPINO, RANI DASI, MARY KAY HELING, AUDREY MEIGS, LARRY REPANES, AMY GRACE BRYANT, RALIM ALLSTON, KEMEKA SIDBURY, THE NAACP NORTH CAROLINA STATE CONFERENCE, AND THE LEAGUE OF WOMEN VOTERS OF NORTH CAROLINA

Gabriela Adler-Espino, Rani Dasi, Mary Kay Heling, Audrey Meigs, Larry Repanes, Amy Grace Bryant, Ralim Allston, Kemeka Sidbury, the NAACP North Carolina State Conference, and the League of Women Voters of North Carolina (the "Proposed Intervenors") respectfully request that they be permitted to intervene as defendants in this action as of right under Federal Rule of Civil Procedure 24(a) or, in the alternative, permissively under Federal Rule of Civil Procedure 24(b).

Dated: June 17, 2025

Respectfully submitted,

## /s/ Jeffrey Loperfido

Jeffrey Loperfido

Caitlin A. Swain (No. 57042) Kathleen Roblez (No. 57039) Ashley Mitchell (No. 56889)

**Forward Justice** 

P.O. Box 1932 Durham, NC 27702

Telephone: 919-907-8586 cswain@forwardjustice.org kroblez@forwardjustice.org amitchell@forwardjustice.org

Jeffrey Loperfido (N.C. Bar No. 52939) SOUTHERN COALITION FOR SOCIAL JUSTICE

5517 Durham Chapel Hill Blvd. Durham, NC 27707 Telephone: 919-794-4213 jeffloperfido@scsj.org

Andrew B. Garber\* (N.Y. Bar No.: 5684147)

BRENNAN CENTER FOR JUSTICE AT NYU SCHOOL OF LAW

120 Broadway, Suite 1750 New York, NY 10271 Telephone: 646-292-8310 garbera@brennan.law.nyu.edu

Maura Eileen O'Connor\* (N.Y. Bar No.: 4312302)

Justin Lam\* (D.C. Bar No.: 1766514) Brennan Center for Justice at NYU School of Law

Suite 1150 Washington, DC 20036 Telephone: 202-249-7190 oconnore@brennan.law.nyu.edu lamju@brennan.law.nyu.edu

1140 Connecticut Avenue NW

Counsel for Proposed Intervenor-Defendants

\*Notice of Special Appearance Forthcoming

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was served on all parties via CM/ECF.

Dated: June 17, 2025 Respectfully submitted,

/s/ Jeffrey Loperfido

Jeffrey Loperfido

Jeffrey Loperfido (N.C. Bar No. 52939) SOUTHERN COALITION FOR SOCIAL JUSTICE 5517 Durham Chapel Hill Blvd.

Durham, NC 27707 Telephone: 919-794-4213 jeffloperfido@scsj.org

Counsel for Proposed Intervenor-Defendants